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File Number
6001.013

March 14, 2023

VIA ELECTRONIC FILING (ECF)

Hon. Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: **United States of America and States of the United States, ex rel.
Donohue v. Richard Carranza, et al., 1:20-CV-05396-GHW-SDA**

Dear Judge Woods

We represent defendants San Diego Unified School District, former Superintendent Cindy Marten, and Dr. Lamont Jackson, in his official capacity as Superintendent (collectively, "San Diego Defendants"), in the above-referenced action.

We write to join the NYC DOE's request for a thirty-day extension of time to move for attorneys' fees under 31 U.S.C. § 3730(d)(4) (Dkt. #260). Like the NYC DOE, this extension will afford San Diego Defendants additional time to properly evaluate the relevant legal standards and their applicability to the case. It will also promote judicial efficiency by avoiding piecemeal litigation of the attorneys' fees issue. This is the first request for an extension of time to file this motion.

We appreciate the Court's courtesies. The San Diego Defendants and undersigned counsel thank the Court for its attention to this matter.

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Respectfully,
ORBACH HUFF & HENDERSON LLP

A handwritten signature in blue ink, appearing to read "Enrique Vassallo", is written over a horizontal line.

Enrique Vassallo, Attorney
Whitney Antrim, Attorney